

ANTHONY L. RICCO
ATTORNEY AT LAW
20 VESEY STREET • SUITE 400
NEW YORK, NEW YORK 10007
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TEL (212) 791-3919
FAX (212) 964-2926
tonyricco@aol.com

September 13, 2019

Hon. Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Donville Inniss*, Docket No. 18-Cr.-134 (KAM)

Dear Judge Matsumoto:

On July 15, 2019, the government provided defense counsel with expert notice pursuant to Rules 16(a)(1)(G) and 26.1 of the Federal Rules of Criminal Procedure. During the pretrial conference on September 6, 2019, defense counsel agreed to let the court know by today, September 13, 2019, whether the defense objects to the proposed testimony of Thomas Durbin, LLM, who is the government's expert witness on Barbadian law.

With the court's permission, defense counsel is requesting an opportunity to file our objections by Monday September 16, 2019. We just need some additional time to complete our legal research as it relates to laws of a foreign nation.

Finally, the government has been informed of counsel's intention to request this brief extension of time and has no objection.

Respectfully,

Anthony L. Ricco
Anthony L. Ricco

cc: A.U.S.A. Sylvia Shweder (By E.C.F.)

cc: Gerald M. Moody, Jr. (By E.C.F.)
Trial Attorney
U.S. Department of Justice